

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

VADIM E. MIKERIN,

Defendants.

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CRIMINAL NO. TDC-14-0529

SECOND BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America, by and through the undersigned counsel, hereby gives this second notice pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure of its intent to seek the forfeiture of certain additional property in the above-referenced case.

The Indictment in this matter seeks forfeiture pursuant to Title 21, United States Code, Section 853(a) “the forfeiture allegation”). In connection with the forfeiture allegation, the United States hereby gives notice that, in addition to property already listed in the forfeiture allegation, the United States is seeking forfeiture of the following additional property:

(1) \$18,170 in U.S. Currency, seized from the Defendant’s apartment on October 29, 2014.

Filed this 22nd day of May 2015.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney

/s/

David I. Salem
Assistant United States Attorney
6500 Cherrywood Lane, Suite 200
Greenbelt, MD 20770

CERTIFICATE OF SERVICE

This is to certify that on this 22nd day of May 2015, a copy of the foregoing Government's

Second Bill of Particulars was electronically filed and delivered via ECF to:

Jonathan E. Lopez
William B. Jacobson
Guy D. Singer
ORRICK, HERRINGTON & SUTCLIFFE LLP
Orrick Building at Columbia Center
1152 15th Street, NW Washington, D.C. 20005-1706

Counsel for Defendant Vadim Mikerin

_____/s/_____
David I. Salem
Assistant United States Attorney